

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

STEPHANIE J. ROSKOVSKI
SCOTT A. ROSKOVSKI

19-106
Criminal No.

(18 U.S.C. §§ 2, 669(a), 1341, 1349, 1014,
1956(h), 1956(a)(1)(B)(i), and 1957(a))

[UNDER SEAL]

INDICTMENT

FILED

APR 17 2019

The grand jury charges:

GENERAL ALLEGATIONS

At all times material to this Indictment:

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

1. The defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, were married and resided at 102 Dogwood Court, Butler, Pennsylvania 16001.
2. Butler Health System was located in Butler, Pennsylvania, and operated Butler Healthcare Providers, d/b/a Butler Memorial Hospital (hereinafter "BHS"). BHS provided healthcare services to residents of Butler, Pennsylvania, and the surrounding region.
3. The defendant, STEPHANIE J. ROSKOVSKI, was an employee of BHS, serving as the Vice President for Outpatient Services from May 2007 to April 2012, and as the Chief Operating Officer ("COO") from April 2012, until her termination in August 2017, during which time she reported directly to the Chief Executive Officer ("CEO").
4. As the COO, the defendant, STEPHANIE J. ROSKOVSKI, was part of an administrative team of 10 or more directors/vice presidents. Her responsibilities included management over the hospital and physician division of operations and working with the Board of Directors, other members of management, and the medical staff to develop and implement strategic

plans, budgets, and policies relating to enhancing revenue, reducing costs, and achieving improved performance.

5. BHS maintained two checking accounts, in the name of Butler Memorial Hospital (hereinafter "BMH"), from which expenses were paid, one at NexTier Bank (NexTier), account number xxxx8644, and another at Branch Banking and Trust Company (BB&T), account number xxxx6062.

6. BHS provided each of the directors with individual corporate credit cards, that is, VISA credit cards in their individual names from NexTier, to be used for business-related expenditures. The defendant, STEPHANIE J. ROSKOVSKI, maintained a BHS provided VISA corporate credit card, with associated account numbers xxxx4725, xxxx4440, xxxx2880, and xxxx9380.

7. BHS received a combined monthly VISA credit card statement by mail, along with individual statements for each employee/cardholder. The master statement contained transactions for all cardholders, and was paid immediately to avoid late fees and interest charges. BHS distributed the associated, individual statements and required each cardholder to attach receipts or other documentation to verify that the expenses were business-related. Cardholders incurring personal expenses on the corporate VISA were required to identify and reimburse BHS for said personal expenditures.

8. BHS reimbursed employees, to include the defendant, STEPHANIE J. ROSKOVSKI, for the use of a personal credit card or other monies for business-related expenditures. The BHS accounting department disbursed funds by check, issued from either the BHS checking account maintained at NexTier or at BB&T, reimbursing such an expenditure, only after the employee provided documentation establishing its business-related nature and obtained

their supervisor's approval. Said checks were ordinarily mailed via U.S. First Class Mail directly to the requesting employee.

9. BHS issued checks made payable to third-party vendors for expenditures made by the defendant, STEPHANIE J. ROSKOVSKI, for business-related purposes. The accounting department disbursed funds by check, issued from the BHS checking account maintained at NexTier Bank or BB&T, after the defendant provided documentation establishing the expenditure's business-related purpose and upon the CEO's approval. Said checks were provided directly to the defendant, STEPHANIE J. ROSKOVSKI, mailed via U.S. First Class Mail directly to a third-party vendor, or hand-delivered by a BHS employee, at the defendant, STEPHANIE J. ROSKOVSKI's direction.

10. The defendant, SCOTT A. ROSKOVSKI, was employed as a detective with the Butler County District Attorney's Office, located in Butler, Pennsylvania, and conducted investigations involving fraud and other financial crimes.

11. The defendant, SCOTT A. ROSKOVSKI, maintained a personal credit card with American Express (hereinafter "AMEX"), with associated account number xxxx1012.

12. The defendant, STEPHANIE J. ROSKOVSKI, maintained a personal credit card with AMEX, with associated account numbers xxxx3000 and xxxx4008.

13. The defendant, STEPHANIE J. ROSKOVSKI, maintained a personal credit card with DISCOVER, with associated account number xxxx6471.

14. The defendants' son, an individual known to the grand jury and herein identified as "JR", maintained a personal credit card with AMEX, with associated account number xxxx1020.

15. The address assigned to the each of the above-listed, personal and BHS credit cards was 102 Dogwood Court, Butler, Pennsylvania 16001.

16. The defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, maintained a joint personal checking account at PNC Bank, account number xxxx3782.

17. The defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, on or about June 4, 2015, purchased an existing motocross business and its associated real property, known as Switchback MX, LLC (hereinafter "Switchback"), a motocross racetrack located at 2469 William Flynn Hwy, Butler, Pennsylvania 16001, for approximately \$1.2 million. The Switchback property consisted of approximately 72 acres with three or more outdoor racetracks, a 47,000 square foot, indoor racetrack facility, and wooded trails for dirt bike riders. The defendant, SCOTT A. ROSKOVSKI, was primarily responsible for operating the Switchback business.

THE SCHEME AND ARTIFICE TO DEFRAUD

18. From in and around April 2011, and continuing thereafter until in and around December 2017, in the Western District of Pennsylvania, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, well knowing that such pretenses, representations, and promises were false and fraudulent when made, which such scheme and artifice to defraud was, in substance, as follows:

19. It was part of the scheme and artifice to defraud that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, used STEPHANIE J. ROSKOVSKI's BHS corporate VISA credit card for personal expenditures totaling approximately \$504,320. Such personal expenditures included, but were not limited to, family vacations, household furnishings, concert and event tickets, Switchback expenses, and gift cards.

20. It was further part of the scheme and artifice to defraud that the defendant, STEPHANIE J. ROSKOVSKI, in keeping with BHS procedures and for the purpose of verifying that expenses incurred on her corporate VISA were business-related, provided the CEO and other BHS personnel with altered, fraudulent, and fictitious receipts, as well as handwritten notes falsely purporting the defendants' personal expenditures were incurred for business-related purposes, such as, "Physician Compensation Book", "conference", "physician recruitment", "physician gifts", "recognition", and "welcome gifts".

21. It was further part of the scheme and artifice to defraud that the defendant, STEPHANIE J. ROSKOVSKI, for the purpose of obtaining BHS monies, provided the CEO disbursement request forms on which she falsely purported having personally incurred business expenses, in amounts generally less than \$1,000, for which she sought reimbursement.

22. It was further part of the scheme and artifice to defraud that the defendant, STEPHANIE J. ROSKOVSKI, after receiving the CEO's approval and signature on said disbursement request forms and prior to submitting said forms to the BHS accounting department for payment, altered the forms by increasing the amount of the disbursement requests and/or by adding additional expenses, and attaching copies of personally issued checks and altered, fictitious, and fraudulent receipts stemming from the use of the defendants' personal AMEX and Discover credit cards and JR's personal AMEX credit card, as well as handwritten notes as supporting documentation, so as to make such disbursement requests appear to be business-related.

23. It was further part of the scheme and artifice to defraud that the defendant, STEPHANIE J. ROSKOVSKI, delivered approximately 48 such falsified disbursement request forms to the CEO for approval, and then to the BHS accounting department for payment, triggering the issuance of approximately 48 checks totaling more than \$489,000 from the BHS checking

accounts, and, in most instances, the mailing of said checks to the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI's residence, for the alleged reimbursement of business-related expenses.

24. It was further part of the scheme and artifice to defraud that the defendants, SCOTT A. ROSKOVSKI and STEPHANIE J. ROSKOVSKI, after receiving said disbursement checks, most of which having been mailed to their residence, deposited said BHS checks totaling more than \$489,000 into their joint, personal checking account at PNC Bank.

25. It was further part of the scheme and artifice to defraud that the defendants, SCOTT A. ROSKOVSKI and STEPHANIE J. ROSKOVSKI, used said fraudulently obtained and deposited funds to pay personal expenses, including, but not limited to, the defendants, STEPHANIE J. ROSKOVSKI's and SCOTT A. ROSKOVSKI's personal AMEX and DISCOVER credit card bills reflecting personal travel expenses, airline tickets, hair and beauty treatments, home furnishings, among others things; JR's AMEX credit card bills and the purchases reflected therein; mortgage payments and automobile payments; as well as to make ATM cash withdrawals and transfers to personal investment and savings accounts.

26. It was further part of the scheme and artifice to defraud that the defendant, STEPHANIE J. ROSKOVSKI, for the purpose of obtaining BHS monies, submitted "Direct Vendor" disbursement request forms to the CEO, for his approval and signature, on which the defendant, STEPHANIE J. ROSKOVSKI, falsely represented that she needed funds, in amounts of generally less than \$1,000, for the purchase of merchant gift cards to be disseminated at business-related "focus groups", or to be used for "sponsorships" and "marketing incentives".

27. It was further part of the scheme and artifice to defraud that the defendant, STEPHANIE J. ROSKOVSKI, after receiving the CEO's approval and signature on said "Direct

Vendor” disbursement request forms and prior to submitting said forms to the BHS accounting department for issuance of payment, altered the forms by significantly increasing the amount of the disbursement requests.

28. It was further part of the scheme and artifice to defraud that the defendant, STEPHANIE J. ROSKOVSKI, delivered approximately 36 falsified disbursement request forms, to the CEO and to the BHS accounting department, for the purpose of obtaining BHS monies in the form of checks issued from its checking accounts and made payable to various retail vendors, including Home Depot, Lowes, Giant Eagle, Rural King, Staples, Target, and Walmart, among others, as well as made payable to Simon Mall.

29. It was further part of the scheme and artifice to defraud, that BHS, in reliance upon the false and fictitious information provided by the defendant, STEPHANIE J. ROSKOVSKI, issued approximately 41 checks from its accounts maintained at NexTier and BB&T to the various retail vendors and to Simon Mall, and either provided said checks to the defendant, STEPHANIE J. ROSKOVSKI, or mailed them directly to the vendor, at her request.

30. It was further part of the scheme and artifice to defraud that on or about July 16, 2012, the defendant, STEPHANIE J. ROSKOVSKI, having received a BHS “Direct Vendor” check (NexTier check, Number 043559) issued to Simon Mall for \$9,500, provided said check to the defendant, SCOTT A. ROSKOVSKI.

31. It was further part of the scheme and artifice to defraud that on various dates between April 2011 and March 2017, either the defendant, STEPHANIE J. ROSKOVSKI, or the defendant, SCOTT A. ROSKOVSKI, negotiated and caused to be negotiated the “Direct Vendor” checks for the purchase of merchant gift cards and AMEX and VISA gift cards, totaling approximately \$306,000, at various retail establishments and at Simon Mall.

32. It was further part of the scheme and artifice to defraud that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, received all gift cards purchased.

33. It was further part of the scheme and artifice to defraud that the defendant, STEPHANIE J. ROSKOVSKI, for the purpose of obtaining BHS monies and vendor gift cards totaling \$48,000, twice submitted requests by email, in May 2016 and in June 2017, to BHS's Director of Materials Management, in which the defendant, STEPHANIE J. ROSKOVSKI, falsely represented that for business-related purposes she needed gift cards, valued individually at \$100 and \$250, from Home Depot, Lowes, Dick's Sporting Goods, Walmart, Sheetz, and Rural King.

34. It was further part of the scheme and artifice to defraud that the Director of Materials Management, at the defendant, STEPHANIE J. ROSKOVSKI's request, obtained \$48,000 in vendor gift cards and provided said gift cards to the defendant.

35. It was further part of the scheme and artifice to defraud that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, jointly and individually, used the purchased gift cards for personal expenditures, such as lavish vacations, home remodeling, Switchback equipment repair and give-away prizes, groceries, and fuel, among others, and as gifts for Switchback employees, hair salon employees, and the defendants' housekeeper.

COUNTS ONE – NINETEEN

The grand jury further charges:

Paragraphs 1 through 35 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

36. On or about the dates set forth below, in the Western District of Pennsylvania, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, for the purposes of executing the aforesaid scheme and artifice to defraud, and in attempting to do so, did knowingly

place and cause to be placed in a post office or authorized depository for United States mail matter in Butler, Pennsylvania, disbursement checks issued by BHS, made payable to the defendant, STEPHANIE J. ROSKOVSKI, and sent and delivered to 102 Dogwood Ct., Butler, PA 16001, by the United States Postal Service according to the directions thereon, each such use of the mail being a separate count of this Indictment:

Count	Date Mailed	BHS Account	Check Amount
1	10/22/2014	NexTier, Check No. 085280	\$24,875.40
2	05/20/2015	NexTier, Check No. 095527	\$35,499.38
3	06/17/2015	NexTier, Check No. 097231	\$1,112.77
4	07/22/2015	NexTier, Check No. 099126	\$21,978.97
5	09/16/2015	NexTier, Check No. 101615	\$9,353.71
6	10/07/2015	NexTier, Check No. 102677	\$8,800.25
7	12/22/2015	NexTier, Check No. 106742	\$9,710.13
8	02/19/2016	BB&T, Check No. 109810	\$33,542.12
9	07/20/2016	BB&T, Check No. 118706	\$9,885.49
10	08/10/2016	BB&T, Check No. 119775	\$10,496.76
11	09/07/2016	BB&T, Check No. 121019	\$9,980.37
12	09/30/2016	BB&T, Check No. 122582	\$9,852.44
13	11/09/2016	BB&T, Check No. 124587	\$20,109.24
14	01/18/2017	BB&T, Check No. 128099	\$7,994.75
15	03/29/2017	BB&T, Check No. 132201	\$13,310.77
16	04/26/2017	BB&T, Check No. 133772	\$14,056.27
17	05/17/2017	BB&T, Check No. 134926	\$22,755.08
18	05/31/2017	BB&T, Check No. 135865	\$17,421.88
19	06/21/2017	BB&T, Check No. 137617	\$9,962.64

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS TWENTY – TWENTY-TWO

The grand jury further charges:

Paragraphs 1 through 35 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

37. On or about the dates set forth below, in the Western District of Pennsylvania and elsewhere, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, for the purposes of executing the aforesaid scheme and artifice to defraud, and in attempting to do so, did knowingly place and cause to be placed in a post office or authorized depository for United States mail matter in Butler, Pennsylvania, “Direct Vendor” checks issued by BHS, made payable to Giant Eagle, Inc., for the purchase of gift cards, and sent and delivered by the United States Postal Service according to the directions thereon, each such use of the mail being a separate count of this Indictment:

Count	Date Mailed	Mailed To	BHS Account	Check Amount
20	09/17/2015	PO Box 951676 Cleveland, OH 44193	BB&T, Check No. 101586	\$7,125.00
21	06/24/2016	PO Box 951676 Cleveland, OH 44193	BB&T, Check No. 117136	\$7,125.00
22	12/28/2016	101 Kappa Drive Pittsburgh, PA 15238	BB&T, Check No. 126892	\$7,125.00

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNT TWENTY-THREE

The grand jury further charges:

Paragraphs 1 through 37 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

38. From in or around April 2011, until in and around December 2017, in the Western District of Pennsylvania, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly and willfully conspire, combine, confederate, and agree with each other and with other persons known and unknown to the grand jury, to commit offenses against the United States, that is, mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2.

39. The manner and means of the conspiracy was in sum and substance as described in paragraphs 1 through 37, above, which are re-alleged and incorporated, as if fully set forth herein.

In violation of Title 18, United States Code, Section 1349.

COUNTS TWENTY-FOUR – TWENTY-EIGHT

The grand jury further charges:

Paragraphs 1 through 35 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

40. On or about the dates set forth below, in the Western District of Pennsylvania, the defendant, STEPHANIE J. ROSKOVSKI, who was not the rightful owner, did knowingly and willfully embezzle, steal, and convert without authority to her personal use, the moneys, funds, and property of Butler Healthcare Providers, d/b/a Butler Memorial Hospital, a healthcare benefit program as defined in Title 18, United States Code, Section 24(b), each such embezzlement being greater than \$100.00 and a separate count of this Indictment:

Count	On or About Date	BHS Account	Check Amount
24	10/22/2014	NexTier, Check No. 085280	\$24,875.40
25	05/20/2015	NexTier, Check No. 095527	\$35,499.38
26	02/19/2016	BB&T, Check No. 109810	\$33,542.12
27	05/17/2017	BB&T, Check No. 134926	\$22,755.08
28	05/31/2017	BB&T, Check No. 135865	\$17,421.88

In violation of Title 18, United States Code, Section 669(a).

COUNT TWENTY-NINE

The grand jury further charges:

Paragraphs 1 through 37 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

41. From in and around April 2011, and continuing thereafter to in and around December 2017, in the Western District of Pennsylvania, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly and intentionally combine, conspire, and agree together and with each other to commit money laundering offenses against the United States, that is:

a. To knowingly conduct and attempt to conduct financial transactions involving property representing the proceeds of a specified unlawful activity, that is mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2, knowing that the transactions were designed, in whole or in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and

b. To knowingly engage and attempt to engage in monetary transactions in criminally derived property with a value greater than \$10,000, such property having been derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957(a).

Manner and Means of the Conspiracy

42. It was part of the conspiracy that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, negotiated and caused to be negotiated fraudulently obtained "Direct Vendor" checks, issued from the bank accounts of BHS, at retail establishments and at Simon Mall for the purchase of gift cards to be used like cash and which concealed, in whole or in

part, their ownership and control of proceeds of the fraud the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, perpetrated upon BHS.

43. It was further part of the conspiracy that on or about the dates set forth below, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did conduct or cause to be conducted the following monetary transactions, among others, in the Western District of Pennsylvania and elsewhere, for the purchase of said gift cards:

Date	"Direct Vendor" Check No.	Vendor	Amount
04/15/2011	19568	Simon Mall	\$9,500.00
04/28/2011	20765	Target	\$5,000.00
07/15/2011	25801	Giant Eagle	\$7,125.00
12/02/2011	32067	Simon Mall	\$9,500.00
02/17/2012	36792	Giant Eagle	\$4,750.00
03/27/2012	37674	Target	\$3,000.00
04/22/2012	38831	Simon Mall	\$9,500.00
05/14/2012	40034	Home Depot	\$4,000.00
06/18/2012	42280	Giant Eagle	\$7,125.00
07/16/2012	43559	Simon Mall	\$9,500.00
12/03/2012	51804	Giant Eagle	\$7,125.00
03/05/2013	54739	Simon Mall	\$9,500.00
05/10/2013	58560	Giant Eagle	\$8,550.00
06/24/2013	60904	Lowes	\$7,500.00
07/01/2013	60965	Simon Mall	\$9,500.00
12/17/2013	69725	Simon Mall	\$7,500.00
12/13/2013	69726	Walmart	\$8,000.00
12/18/2013	69742	Giant Eagle	\$7,125.00
07/02/2014	80267	Giant Eagle	\$7,125.00
07/16/2014	80270	Home Depot	\$7,500.00
07/11/2014	80293	Simon Mall	\$7,500.00
01/28/2015	89706	Simon Mall	\$9,000.00
03/11/2015	92084	Giant Eagle	\$3,840.00
09/16/2015	101586	Giant Eagle	\$7,125.00
01/30/2016	108213	Simon Mall	\$9,500.00
05/19/2016	114477	Dick's Sporting Goods	\$5,000.00
05/19/2016	114475	Lowes	\$7,500.00
05/27/2016	114474	Home Depot	\$7,500.00
05/23/2016	117136	Giant Eagle	\$7,125.00
06/27/2016	117367	Walmart	\$10,000.00
07/22/2016	118964	Rural King	\$5,000.00

07/27/2016	118702	Simon Mall	\$12,500.00
12/22/2016	126546	Rural King	\$5,000.00
12/23/2016	126547	Simon Mall	\$9,500.00
12/28/2016	126892	Giant Eagle	\$7,125.00
03/16/2017	131353	Simon Mall	\$9,900.00
06/28/2017	137852	Dick's Sporting Goods	\$2,000.00
06/28/2017	137846	Lowes	\$2,000.00
06/28/2017	137847	Rural King	\$5,000.00
06/28/2017	137848	Sheetz	\$2,000.00
06/28/2017	137853	Walmart	\$5,000.00

44. It was further part of the conspiracy that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, used the gift cards for the purchase of personal property and family expenditures.

45. It was further part of the conspiracy that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, deposited into the their joint checking account at PNC Bank the fraudulently obtained disbursement checks issued by BHS to the defendant, STEPHANIE J. ROSKOVSKI, for the alleged reimbursement of personal funds expended for business-related purposes.

46. It was further part of the conspiracy that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, used said fraudulently obtained and deposited funds to pay personal expenses, including, but not limited to, the defendants' personal credit card bills reflecting personal travel expenses, airline tickets, hair and beauty treatments, home furnishings, among others things; JR's AMEX credit card bills and the purchases reflected therein; automobile payments; as well as to make transfers to personal investment and savings accounts.

47. It was further part of the conspiracy that on or about the dates set forth below, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did conduct or cause to be conducted, in the Western District of Pennsylvania and elsewhere, the following monetary

transactions, among others, in said property derived from the mail fraud scheme and deposited to the joint checking account at PNC Bank, each such transaction having a value in excess of \$10,000:

Date	Transaction	Amount
11/03/2014	Electronic Transfer to PNC Money Market xxx8738	\$15,000.00
02/02/2015	Electronic Transfer to PNC Money Market xxx8738	\$15,000.00
02/27/2015	Online Payment to AMEX	\$13,952.41
05/29/2015	Cash Withdrawal	\$76,500.00
06/04/2015	Withdrawal - Cashier's Check	\$10,778.57
09/23/2015	Online Payment to AMEX	\$17,857.92
01/06/2016	Online Payment to AMEX	\$15,000.00
01/20/2016	Online Payment to AMEX	\$19,381.27
01/22/2016	Check No.1652 to Chase Auto Finance	\$17,802.73
02/24/2016	Online Payment to AMEX	\$12,005.05
02/24/2016	Electronic Transfer to PNC Money Market xxx8738	\$20,000.00
03/02/2016	Check No. 1706 to RBS Citizens	\$15,211.56
09/13/2016	Online to AMEX	\$19,980.94
11/15/2016	Online to AMEX	\$21,994.11
11/18/2016	Electronic Transfer to PNC Money Market xxx8738	\$22,000.00
12/19/2016	Online Payment to AMEX	\$14,920.10
01/09/2017	Online Payment to AMEX	\$15,000.00
01/13/2017	Electronic Transfer to PNC Money Market xxx8738	\$15,000.00
02/21/2017	Online Payment to AMEX	\$17,273.30
04/06/2017	Electronic Transfer to PNC Money Market xxx8738	\$15,000.00

48. It was further part of the conspiracy that on or about July 27, 2016, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did conduct or cause to be conducted, in the Western District of Pennsylvania and elsewhere, a monetary transaction in property derived from mail fraud in excess of \$10,000.00, that is the defendants, using BHS check, Number 118702, in the amount of \$12,500.00, issued from the BHS account maintained at BB&T and made payable to "Simon Mall", purchased 72 VISA gift cards with a total value of \$12,500.00.

In violation of Title 18, United States Code, Section 1956(h).

COUNT THIRTY

The grand jury further charges:

Paragraphs 1 through 37 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

49. On or about December 23, 2016, in the Western District of Pennsylvania, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce which involved the proceeds of specified unlawful activity, knowing that the property involved represented the proceeds of some form of unlawful activity, and knowing that said financial transaction was designed in whole or in part to conceal and disguise the location, source, ownership and control of the proceeds of specified unlawful activity, in that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, using BHS check, Number 126547, in the amount of \$9,500.00, issued from the BHS account maintained at BB&T and made payable to "Simon Mall", consisting of the proceeds of mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2, did purchase and cause to be purchased 19 VISA gift cards, each in the amount of \$500.00, from Ross Park Mall, a Simon Mall located in Pittsburgh, Pennsylvania.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT THIRTY-ONE

The grand jury further charges:

Paragraphs 1 through 37 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

50. On or about December 28, 2016, in the Western District of Pennsylvania, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce which involved the proceeds of specified unlawful activity, knowing that the property involved represented the proceeds of some form of unlawful activity, and knowing that said financial transaction was designed in whole or in part to conceal and disguise the location, source, ownership and control of the proceeds of specified unlawful activity, in that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, caused a BHS check, Number 126892, in the amount of \$7,125.00, issued from the BHS account maintained at BB&T and made payable to "Giant Eagle, Inc.", consisting of the proceeds of mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2, to be used for the purchase of 75 Giant Eagle gift cards, each in the amount of \$100.00, from Giant Eagle, Inc., located in Pittsburgh, Pennsylvania.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT THIRTY-TWO

The grand jury further charges:

Paragraphs 1 through 37 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

51. On or about March 16, 2017, in the Western District of Pennsylvania and elsewhere, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce which involved the proceeds of specified unlawful activity, knowing that the property involved represented the proceeds of some form of unlawful activity, and knowing that said financial transaction was designed in whole or in part to conceal and disguise the location, source, ownership and control of the proceeds of specified unlawful activity, in that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, using BHS check, Number 131353, in the amount of \$9,900.00, issued from the BHS account maintained at BB&T and made payable to "Simon Mall", consisting of the proceeds of mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2, purchased and caused to be purchased 65 VISA gift cards; one in the amount of \$450.00, 25 in the amount of \$250.00 each, 25 in the amount of \$100.00 each, and 14 in the amount of \$50.00 each, from Ross Park Mall, a Simon Mall located in Pittsburgh, Pennsylvania.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT THIRTY-THREE

The grand jury further charges:

Paragraphs 1 through 37 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

52. On or about February 24, 2016, in the Western District of Pennsylvania and elsewhere, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly engage in a monetary transaction affecting interstate commerce, in criminally derived property with a value greater than \$10,000, which property was derived from specified unlawful activity, in that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did issue and cause to be issued from their joint checking account maintained at PNC Bank, in the Western District of Pennsylvania, an online payment to American Express, in Greensboro, North Carolina, in the amount of \$12,005.05, knowing that the funds were derived from a criminal offense, when in fact said funds were derived from specified unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2.

In violation of Title 18, United States Code, Sections 1957(a) and 2.

COUNT THIRTY-FOUR

The grand jury further charges:

Paragraphs 1 through 37 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

53. On or about March 2, 2016, in the Western District of Pennsylvania and elsewhere, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly engage in a monetary transaction affecting interstate commerce, in criminally derived property with a value greater than \$10,000, which property was derived from specified unlawful activity, in that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did issue and cause to be issued a check, Number 1706, from their joint checking account at PNC Bank in the Western District of Pennsylvania, account number xxxx3782, made payable to "RBS Citizens" in Providence, Rhode Island, in the amount of \$15,211.56, as final payment for the defendant, SCOTT A. ROSKOVSKI's Toyota Tundra truck, knowing that the funds were derived from a criminal offense, when in fact said funds were derived from specified unlawful activity, that is mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2,

In violation of Title 18, United States Code, Sections 1957(a) and 2.

COUNT THIRTY-FIVE

The grand jury further charges:

Paragraphs 1 through 37 of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

54. On or about July 27, 2016, in the Western District of Pennsylvania and elsewhere, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly engage in a monetary transaction affecting interstate commerce, in criminally derived property with a value greater than \$10,000, which property was derived from specified unlawful activity, in that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, using check number 118702, issued from the BB&T bank account maintained by BHS, in the amount of \$12,500.00, purchased and caused to be purchased 72 VISA gift cards totaling \$12,500.00, knowing that the funds were derived from a criminal offense, when in fact said funds were derived from specified unlawful activity, that is mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2.

In violation of Title 18, United States Code, Sections 1957(a) and 2.

COUNT THIRTY-SIX

The grand jury further charges:

55. On or about March 16, 2018, in the Western District of Pennsylvania, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly make false statements in an application for a loan submitted by the defendants to S&T Bank, located in Indiana, Pennsylvania, a bank the accounts of which were insured by the Federal Deposit Insurance Corporation, for the purpose of influencing the action of the said bank to approve and issue a loan in the amount of \$1,128,227, in that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, stated and represented in the Personal Financial Statement, an integral part of the loan application, that the defendant, STEPHANIE J. ROSKOVSKI, was employed and earning \$275,000 in annual income and that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, had financial liabilities in the form of "Other Liabilities" totaling \$0, whereas in truth and fact, as the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, well knew, such statements were false, fictitious, and fraudulent in that the defendant, STEPHANIE J. ROSKOVSKI, had been terminated from her employment prior to submission of the loan application and that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, had an outstanding liability, in addition to reported mortgages and notes, in the approximate amount of \$270,000, payable to Butler Healthcare Providers, d/b/a Butler Memorial Hospital.

In violation of Title 18, United States Code, Section 1014.

COUNT THIRTY-SEVEN

The grand jury further charges:

56. On or about July 25, 2018, in the Western District of Pennsylvania, the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, did knowingly make false statements in an application for a loan submitted by the defendants to S&T Bank, located in Indiana, Pennsylvania, a bank the accounts of which were insured by the Federal Deposit Insurance Corporation, for the purpose of influencing the action of the said bank to approve and issue a loan in the amount of \$55,384 for the purchase of a bulldozer, in that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, stated and represented in the Personal Financial Statement, an integral part of the loan application, that the defendant, STEPHANIE J. ROSKOVSKI, was employed and earning \$275,000 in annual income and that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, had financial liabilities in the form of "Other Liabilities" totaling \$0, whereas in truth and fact, as the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, well knew, such statements were false, fictitious, and fraudulent in that the defendant, STEPHANIE J. ROSKOVSKI, had been terminated from her employment prior to submission of the loan application and that the defendants, STEPHANIE J. ROSKOVSKI and SCOTT A. ROSKOVSKI, had an outstanding liability, in addition to reported mortgages and notes, in the approximate amount of \$270,000, payable to Butler Healthcare Providers, d/b/a Butler Memorial Hospital.

In violation of Title 18, United States Code, Section 1014.

CRIMINAL FORFEITURE ALLEGATIONS

Mail Fraud

57. The United States hereby gives notice to the defendant(s) charged in Counts One through Twenty-Three that, upon his and/or her conviction of such offense(s), or conspiracy to commit such offense(s), the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense(s) to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense(s), including but not limited to the following:

(a) MONEY JUDGMENT

58. A sum of money equal to at least approximately \$ 1,300,000.00 in United States currency.

(b) SPECIFIC PROPERTY

- Residence located at 102 Dogwood Ct., Butler, Pennsylvania 16001, and the contents therein;
- 2013 Toyota Tundra LT, VIN: 5TFBY5F16DX275755;
- 2014 Honda Ridgeline RTL-S, VIN: 5FPYK1F67EB007588;
- 2013 Range Rover Sport HSX, VIN: SALSK2D42DA785934;
- 2007 International 4200 Water Truck, VIN: 1HTMPAFP57H544712; and
- Switchback MX, LLC, located at 2469 William Flynn Hwy., Butler, Pennsylvania 16001.

59. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant(s) up to the value of the forfeitable property described in this forfeiture allegation.

Embezzlement from a Healthcare Benefit Program

60. The United States hereby gives notice to the defendant, STEPHANIE J. ROSKOVSKI, charged in Counts Twenty-Four through Twenty-Eight that, upon her conviction of any such offense(s), the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(7), which requires any person convicted of such offense(s) to forfeit any property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense(s), including but not limited to, the following:

(a) **MONEY JUDGMENT**

61. A sum of money equal to at least approximately \$ 1,300,000.00 in United States currency.

(b) **SPECIFIC PROPERTY**

- Residence located at 102 Dogwood Ct., Butler, Pennsylvania 16001, and the contents therein;
- 2013 Toyota Tundra LT, VIN: 5TFBY5F16DX275755;
- 2014 Honda Ridgeline RTL-S, VIN: 5FPYK1F67EB007588;
- 2013 Range Rover Sport HSX, VIN: SALSK2D42DA785934;
- 2007 International 4200 Water Truck, VIN: 1HTMPAFP57H544712; and
- Switchback MX, LLC, located at 2469 William Flynn Hwy., Butler, Pennsylvania 16001.

62. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without

difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in this forfeiture allegation.

Money Laundering

63. The United States hereby gives notice to the defendant(s) charged in Counts Twenty-Nine through Thirty-Five that, upon his and/or her conviction of any such offense(s), the government will seek forfeiture in accordance with Title 18, United States Code, Section 982, of all property involved in each offense(s) of conviction in violation of Title 18, United States Code, Sections 1956 and 1957, or conspiracy to commit such offense(s), and all property traceable to such property, including but not limited to, the following:

(a) MONEY JUDGMENT

64. A sum of money equal to at least approximately \$1,300,000.00 in United States currency.

(b) SPECIFIC PROPERTY

- Residence located at 102 Dogwood Ct., Butler, Pennsylvania 16001, and the contents therein;
- 2013 Toyota Tundra LT; VIN: 5TFBY5F16DX275755;
- 2014 Honda Ridgeline RTL-S, VIN: 5FPYK1F67EB007588;
- 2013 Range Rover Sport HSX, VIN: SALS2D42DA785934;
- 2007 International 4200 Water Truck, VIN: 1HTMPAFP57H544712; and
- Switchback MX, LLC, located at 2469 William Flynn Hwy., Butler, Pennsylvania 16001.

65. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without

difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant(s) up to the value of the forfeitable property described in this forfeiture allegation.

False Statements in a Loan Application

66. The United States hereby gives notice to the defendant(s) charged in Counts Thirty-Six and Thirty-Seven that, upon his and/or her conviction of any such offense(s), the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2)(A), which requires any person convicted of such offense(s) to forfeit any property constituting or derived

from proceeds obtained directly or indirectly as a result of such offense(s), including but not limited to the following:

(a) MONEY JUDGMENT

67. A sum of money equal to at least approximately \$1,184,661 in United States currency.

(b) SPECIFIC PROPERTY

- Switchback MX, LLC, located at 2469 William Flynn Hwy., Butler, Pennsylvania 16001; and
- Case 850L Crawler Tractor with Rippers, Serial No. NBDC80071.

68. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without

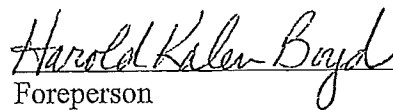
difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of such defendant(s) up to the value of the forfeitable property described in this forfeiture allegation, including but not limited to the following:

- Residence located at 102 Dogwood Ct., Butler, Pennsylvania 16001, and the contents therein;
- 2013 Toyota Tundra LT, VIN: 5TFBY5F16DX275755;
- 2014 Honda Ridgeline RTL-S, VIN: 5FPYK1F67EB007588;

- 2013 Range Rover Sport HSX, VIN: SALSK2D42DA785934; and
- 2007 International 4200 Water Truck, VIN: 1HTMPAFP57H544712.

A True Bill,


Foreperson


SCOTT W. BRADY
United States Attorney
PA ID No. 88352